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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ERIC A. CRUZ,)	Civil No. 3:22-cv-00555-WHO
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO EXTEND THE BRIEFING
v.)	SCHEDULE
)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 20-day extension of time, from September 24, 2022, to October 14, 2022, for Defendant to respond to Plaintiff's Motion for Summary Judgment (Dkt. No. 16).

This is Defendant's second request for an extension of time. Good cause exists for this extension for a couple of reasons. First, this case was recently reassigned to Defendant's counsel, who just returned from extended paternity leave and required time to become fully acquainted with the instant case. Second, shortly after being reassigned this case, Defendant's counsel consulted with his client about its litigation position and began exploring the possibility

1 of settlement with Plaintiff; because no settlement between the parties has been reached at this
2 time, Defendant's counsel requires this second extension to prepare the cross-motion for
3 summary judgment. This request is made in good faith and with no intention to unduly delay
4 the proceedings, and Defendant's counsel does not anticipate that any further extensions will be
5 necessary.

6 Plaintiff does not oppose Defendant's request for an extension of time. The parties
7 further stipulate that the deadline for any reply by Plaintiff, if necessary, will be extended
8 accordingly.

9
10 Respectfully submitted,

11
12 Date: September 21, 2022

SACKETT AND ASSOCIATES

13 By: /s/ Asim H. Modi for Harvey P. Sackett*
14 HARVEY P. SACKETT
15 *Authorized by email on September 21, 2022
Attorneys for Plaintiff

16 Date: September 21, 2022

STEPHANIE HINDS
United States Attorney
MATHEW W. PILE
Associate General Counsel

17 By: /s/ Asim H. Modi
18 ASIM H. MODI
19 Special Assistant United States Attorney
20 Attorneys for Defendant
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ORDER

APPROVED AND SO ORDERED

DATED: _____

HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE